

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:	)	
	)	Chapter 11
CLAIRE'S HOLDINGS LLC, <i>et al.</i> , <sup>1</sup>	)	
	)	Case No. 25-11454 (BLS)
	)	
Debtors.	)	(Jointly Administered)
	)	
	)	

**NOTICE OF *AMENDED*<sup>2</sup> AGENDA OF MATTERS SCHEDULED FOR  
HEARING ON SEPTEMBER 9, 2025 AT 9:30 A.M. (ET)**

**THIS HEARING WILL BE CONDUCTED IN PERSON.**

**ALL PARTIES, INCLUDING WITNESSES, WISHING TO PARTICIPATE IN THE  
HEARING MUST ATTEND IN PERSON.**

**COURTCALL WILL NOT BE USED TO DIAL IN. TO ATTEND A HEARING  
REMOTELY, PLEASE REGISTER USING THE ECOURT APPEARANCES TOOL ON  
THE COURT'S WEBSITE AT [WWW.DEB.USCOURTS.GOV](http://WWW.DEB.USCOURTS.GOV) OR CLICK THE  
FOLLOWING LINK: <https://ecf.deb.uscourts.gov/cgi-bin/nvsbAppearances.pl>.**

**AFTER REGISTERING YOUR APPEARANCE, YOU WILL RECEIVE A  
CONFIRMATION EMAIL CONTAINING INFORMATION ABOUT JOINING THE  
HEARING REMOTELY.**

**IF ATTENDING THIS HEARING REMOTELY, PARTIES ARE REQUIRED TO  
REGISTER FOR THE HEARING BY 4:00 P.M. (ET) ONE BUSINESS DAY PRIOR TO  
THE HEARING. YOU MUST USE YOUR FULL NAME WHEN LOGGING INTO ZOOM  
OR YOU WILL NOT BE ALLOWED INTO THE MEETING.**

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of their federal tax identification numbers, to the extent applicable, are: Claire's Holdings LLC (9619); BMS Distributing Corp. (4117); CBI Distributing Corp. (5574); Claire's (Gibraltar) Holdings Limited (4273); Claire's Boutiques, Inc. (5307); Claire's Canada Corp. (7936); Claire's Intellectual LLC (5274); Claire's Puerto Rico Corp. (6113); Claire's Stores, Inc. (0416); Claire's Swiss Holdings II LLC (7980); Claire's Swiss Holdings LLC (2299); CLSIP Holdings LLC (1950); CLSIP LLC (9769); and CSI Canada LLC (2343). The Debtors' mailing address is 2400 West Central Road, Hoffman Estates, IL 60192.

<sup>2</sup> Amended agenda items appear in bold.

**I. MATTERS FILED UNDER CERTIFICATION:**

1. Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) File a Consolidated List of the Debtors' Thirty Largest Unsecured Creditors, (B) Redact Certain Confidential Information of Customers, (C) Redact Certain Personally Identifiable Information of Individuals, and (D) Serve Certain Parties in Interest by Email, (II) Approving the Form and Manner of Service of the Notice of Commencement, and (III) Granting Related Relief [[Docket No. 3](#); filed August 6, 2025]

Response/Objection Deadline: September 2, 2025 at 4:00 p.m. (ET)

Responses/Objections Received:

- A. Informal comments from the Official Committee of Unsecured Creditors (the "Committee")
- B. Informal comments from the United States Trustee (the "U.S. Trustee")

Related Documents:

- i. Interim Order (I) Authorizing the Debtors to (A) File a Consolidated List of the Debtors' Thirty Largest Unsecured Creditors, (B) Redact Certain Confidential Information of Customers, and (C) Redact Certain Personally Identifiable Information of Individuals, (II) Approving the Form and Manner of Service of the Notice of Commencement, and (III) Granting Related Relief [[Docket No. 89](#); entered August 7, 2025]
- ii. Notice of Entry of Interim Order (I) Authorizing the Debtors to (A) File a Consolidated List of the Debtors' Thirty Largest Unsecured Creditors, (B) Redact Certain Confidential Information of Customers, and (C) Redact Certain Personally Identifiable Information of Individuals, (II) Approving the Form and Manner of Service of the Notice of Commencement, and (III) Granting Related Relief [[Docket No. 115](#); filed August 8, 2025]
- iii. **Certification of Counsel Regarding Final Order (I) Authorizing the Debtors to (A) File a Consolidated List of the Debtors' Thirty Largest Unsecured Creditors, (B) Redact Certain Confidential Information of Customers, (C) Redact Certain Personally Identifiable Information of Individuals, and (D) Serve Certain Parties in Interest by Email, (II) Approving the Form and Manner of Service of the Notice of Commencement, and (III) Granting Related Relief [[Docket No. 339](#); filed September 6, 2025]**

Status: **On September 6, 2025, the Debtors filed a revised form of order under certification of counsel in connection with this matter. Accordingly, a**

hearing with respect to this matter is only required to the extent that the Court has any questions or concerns.

2. Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Payment of Certain Prepetition and Postpetition Taxes and Fees and (II) Granting Related Relief [[Docket No. 5](#); filed August 6, 2025]

Response/Objection Deadline: September 2, 2025 at 4:00 p.m. (ET)

Responses/Objections Received: None at this time

Related Documents:

- i. Interim Order (I) Authorizing the Payment of Certain Prepetition and Postpetition Taxes and Fees and (II) Granting Related Relief [[Docket No. 88](#); entered August 7, 2025]
- ii. Notice of Entry of Interim Order (I) Authorizing the Payment of Certain Prepetition and Postpetition Taxes and Fees and (II) Granting Related Relief [[Docket No. 119](#); filed August 8, 2025]
- iii. **Certification of Counsel Regarding Final Order (I) Authorizing the Payment of Certain Prepetition and Postpetition Taxes and Fees and (II) Granting Related Relief [[Docket No. 345](#); filed September 6, 2025]**

Status: **On September 6, 2025, the Debtors filed a revised form of order under certification of counsel in connection with this matter.** Accordingly, a hearing with respect to this matter is only required to the extent that the Court has any questions or concerns.

3. Motion of Debtors for Entry of Interim and Final Orders (I) Approving the Debtors' Proposed Adequate Assurance of Payment for Future Utility Services, (II) Approving the Debtors' Proposed Procedures for Resolving Additional Assurance Requests, (III) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Services, and (IV) Granting Related Relief [[Docket No. 7](#); filed August 6, 2025]

Response/Objection Deadline: September 2, 2025 at 4:00 p.m. (ET)

Responses/Objections Received:

- A. Objection of Certain Utility Companies to the Motion of Debtors for Entry and Final Orders (I) Approving the Debtors' Proposed Adequate Assurance of Payment for Future Utility Services, (II) Approving the Debtors' Proposed Procedures for Resolving Additional Assurance Requests, (III) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Services, (IV) Authorizing Payments to the Debtors' Utilities

Administrator, and (V) Granting Related Relief [[Docket No. 231](#); filed August 25, 2025]

- B. Informal comments from the Committee
- C. Informal comments from Granite Telecommunications

Related Documents:

- i. Interim Order (I) Approving the Debtors' Proposed Adequate Assurance of Payment for Future Utility Services, (II) Approving the Debtors' Proposed Procedures for Resolving Additional Assurance Requests, (III) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Services, and (IV) Granting Related Relief [[Docket No. 87](#); entered August 7, 2025]
- ii. Notice of Entry of Interim Order (I) Approving the Debtors' Proposed Adequate Assurance of Payment for Future Utility Services, (II) Approving the Debtors' Proposed Procedures for Resolving Additional Assurance Requests, (III) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Services, and (IV) Granting Related Relief [[Docket No. 106](#); filed August 8, 2025]
- iii. Notice of Withdrawal of Objection of Certain Utility Companies to the Motion of Debtors for Entry and Final Orders (I) Approving the Debtors' Proposed Adequate Assurance of Payment for Future Utility Services, (II) Approving the Debtors' Proposed Procedures for Resolving Additional Assurance Requests, (III) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Services, (IV) Authorizing Payments to the Debtors' Utilities Administrator, and (V) Granting Related Relief [[Docket No. 331](#); filed September 5, 2025]
- iv. **Certification of Counsel Regarding Final Order (I) Approving the Debtors' Proposed Adequate Assurance of Payment for Future Utility Services, (II) Approving the Debtors' Proposed Procedures for Resolving Additional Assurance Requests, (III) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Services, and (IV) Granting Related Relief [[Docket No. 346](#); filed September 6, 2025]**

Status: **On September 6, 2025, the Debtors filed a revised form of order under certification of counsel in connection with this matter.** Accordingly, a hearing with respect to this matter is only required to the extent that the Court has any questions or concerns.

4. Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Maintain Insurance, Surety Coverage, and Letters of Credit Entered into Prepetition and Satisfy Prepetition Obligations Related Thereto, (B) Renew, Amend, Supplement, Extend, or Purchase Insurance Policies, Surety Bonds, and Letters of Credit, (C) Continue to Pay Broker Fees, and (D) Honor and Renew their Premium Financing Agreement, and (II) Granting Related Relief [[Docket No. 9](#); filed August 6, 2025]

Response/Objection Deadline: September 2, 2025 at 4:00 p.m. (ET)

Responses/Objections Received: None

Related Documents:

- i. Interim Order (I) Authorizing the Debtors to (A) Maintain Insurance, Surety Coverage, and Letters of Credit Entered into Prepetition and Satisfy Prepetition Obligations Related Thereto, (B) Renew, Amend, Supplement, Extend, or Purchase Insurance Policies, Surety Bonds, and Letters of Credit, (C) Continue to Pay Broker Fees, and (D) Honor and Renew their Premium Financing Agreement, and (II) Granting Related Relief [[Docket No. 85](#); entered August 7, 2025]
- ii. Notice of Entry of Interim Order (I) Authorizing the Debtors to (A) Maintain Insurance, Surety Coverage, and Letters of Credit Entered into Prepetition and Satisfy Prepetition Obligations Related Thereto, (B) Renew, Amend, Supplement, Extend, or Purchase Insurance Policies, Surety Bonds, and Letters of Credit, (C) Continue to Pay Broker Fees, and (D) Honor and Renew their Premium Financing Agreement, and (II) Granting Related Relief [[Docket No. 118](#); filed August 8, 2025]
- iii. **Certification of Counsel Regarding Final Order (I) Authorizing the Debtors to (A) Maintain Insurance, Surety Coverage, and Letters of Credit Entered into Prepetition and Satisfy Prepetition Obligations Related Thereto, (B) Renew, Amend, Supplement, Extend, or Purchase Insurance Policies, Surety Bonds, and Letters of Credit, (C) Continue to Pay Broker Fees, and (D) Honor and Renew their Premium Financing Agreement, and (II) Granting Related Relief [[Docket No. 340](#); filed September 6, 2025]**

Status: **On September 6, 2025, the Debtors filed a revised form of order under certification of counsel in connection with this matter.** Accordingly, a hearing with respect to this matter is only required to the extent that the Court has any questions or concerns.

5. Motion of Debtors for Entry of Interim and Final Orders (I) Approving Notification and Hearing Procedures for Certain Transfers of and Declarations of Worthlessness with Respect to Common Stock and Preferred Stock and (II) Granting Related Relief [[Docket No. 10](#); filed August 6, 2025]

Response/Objection Deadline: September 2, 2025 at 4:00 p.m. (ET)

Responses/Objections Received:

- A. Informal comments from the Committee

Related Documents:

- i. Interim Order (I) Approving Notification and Hearing Procedures for Certain Transfers of and Declarations of Worthlessness with Respect to Common Stock and Preferred Stock and (II) Granting Related Relief [[Docket No. 84](#); entered August 7, 2025]
- ii. Notice of Entry of Interim Order (I) Approving Notification and Hearing Procedures for Certain Transfers of and Declarations of Worthlessness with Respect to Common Stock and Preferred Stock and (II) Granting Related Relief [[Docket No. 105](#); filed August 8, 2025]
- iii. **Certification of Counsel Regarding Final Order (I) Approving Notification and Hearing Procedures for Certain Transfers of and Declarations of Worthlessness with Respect to Common Stock and Preferred Stock and (II) Granting Related Relief [[Docket No. 341](#); filed September 6, 2025]**

Status: **On September 6, 2025, the Debtors filed a revised form of order under certification of counsel in connection with this matter.** Accordingly, a hearing with respect to this matter is only required to the extent that the Court has any questions or concerns.

6. Motion of Debtors for Entry of an Order (I) Extending Time to File Schedules of Assets and Liabilities, Schedules of Current Income and Expenditures, Schedules of Executory Contracts and Unexpired Leases, Statements of Financial Affairs, and Rule 2015.3 Financial Reports and (II) Granting Related Relief [[Docket No. 11](#); filed August 6, 2025]

Response/Objection Deadline: September 2, 2025 at 4:00 p.m. (ET)

Responses/Objections Received: None

Related Documents:

- i. Notice of Motion and Hearing [[Docket No. 232](#); filed August 25, 2025]
- ii. **Certification of Counsel Regarding Order (I) Extending Time to File Schedules of Assets and Liabilities, Schedules of Current Income and Expenditures, Schedules of Executory Contracts and Unexpired Leases, Statements of Financial Affairs, and Rule 2015.3 Financial Reports and (II) Granting Related Relief [[Docket No. 344](#); filed September 6, 2025]**

Status: **On September 6, 2025, the Debtors filed a revised form of order under certification of counsel in connection with this matter.** Accordingly, a hearing with respect to this matter is only required to the extent that the Court has any questions or concerns.

7. Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Continue to Operate the Cash Management System, (B) Honor Certain Prepetition Obligations Related Thereto, (C) Maintain Existing Business Forms, (D) Continue to Perform Intercompany Transactions, (II) Granting Administrative Expense Status to Postpetition Intercompany Transactions, and (III) Granting Related Relief [[Docket No. 13](#); filed August 6, 2025]

Response/Objection Deadline: September 2, 2025 at 4:00 p.m. (ET)

Responses/Objections Received:

- A. Informal comments from the Committee
- B. Informal comments from the Bank of America

Related Documents:

- i. Interim Order (I) Authorizing the Debtors to (A) Continue to Operate the Cash Management System, (B) Honor Certain Prepetition Obligations Related Thereto, (C) Maintain Existing Business Forms, (D) Continue to Perform Intercompany Transactions, (II) Granting Administrative Expense Status to Postpetition Intercompany Transactions, and (III) Granting Related Relief [[Docket No. 83](#); entered August 7, 2025]
- ii. Notice of Entry of Interim Order (I) Authorizing the Debtors to (A) Continue to Operate the Cash Management System, (B) Honor Certain Prepetition Obligations Related Thereto, (C) Maintain Existing Business Forms, (D) Continue to Perform Intercompany Transactions, (II) Granting Administrative Expense Status to Postpetition Intercompany Transactions, and (III) Granting Related Relief [[Docket No. 107](#); filed August 8, 2025]



- iii. **Certification of Counsel Regarding Final Order (I) Authorizing the Debtors to (A) Continue to Operate the Cash Management System, (B) Honor Certain Prepetition Obligations Related Thereto, (C) Maintain Existing Business Forms, (D) Continue to Perform Intercompany Transactions, and (II) Granting Administrative Expense Status to Postpetition Intercompany Transactions, and (III) Granting Related Relief [[Docket No. 349](#); filed September 6, 2025]**

Status: **On September 6, 2025, the Debtors filed a revised form of order under certification of counsel in connection with this matter.** Accordingly, a hearing with respect to this matter is only required to the extent that the Court has any questions or concerns.

- 8. Omnibus Motion of Debtors for Entry of an Order (I) Authorizing the Rejection of Certain Unexpired Leases, (II) Authorizing the Abandonment of Certain Personal Property, Each Effective as of the Petition Date, and (III) Granting Related Relief [[Docket No. 14](#); filed August 6, 2025]

Response/Objection Deadline: August 25, 2025 at 4:00 p.m. (ET); extended to September 2, 2025 at 4:00 p.m. (ET) for various parties.

Responses/Objections Received:

- A. Informal comments from Ballard Spahr, LLP
- B. Informal comments from the Committee

Related Documents:

- i. Notice of Motion and Hearing [[Docket No. 133](#); filed August 11, 2025]
- ii. **Certification of Counsel Regarding Omnibus Order (I) Authorizing the Rejection of Certain Unexpired Leases, (II) Authorizing the Abandonment of Certain Personal Property, Each Effective as of the Petition Date, and (III) Granting Related Relief [[Docket No. 343](#); filed September 6, 2025]**

Status: **On September 6, 2025, the Debtors filed a revised form of order under certification of counsel in connection with this matter.** Accordingly, a hearing with respect to this matter is only required to the extent that the Court has any questions or concerns.

- 9. Motion of Debtors for Entry of an Order (I) Authorizing and Approving Procedures to Reject or Assume Executory Contracts and Unexpired Leases, and (II) Granting Related Relief [[Docket No. 15](#); filed August 6, 2025]



Response/Objection Deadline: August 25, 2025 at 4:00 p.m. (ET); extended to September 2, 2025 at 4:00 p.m. (ET) for various parties.

Responses/Objections Received:

- A. Informal comments from Ballard Spahr, LLP
- B. Informal comments from Barclay Damon LLP
- C. Informal comments from Hanson Bridgett LLP
- D. Informal comments from Kelley Drye & Warren LLP

Related Documents:

- i. Notice of Motion and Hearing [[Docket No. 134](#); filed August 11, 2025]
- ii. **Certification of Counsel Regarding Order (I) Authorizing and Approving Procedures to Reject or Assume Executory Contracts and Unexpired Leases, and (II) Granting Related Relief [[Docket No. 337](#); filed September 6, 2025]**

Status: **On September 6, 2025, the Debtors filed a revised form of order under certification of counsel in connection with this matter.** Accordingly, a hearing with respect to this matter is only required to the extent that the Court has any questions or concerns.

- 10. Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to Assume the Agency Agreement, (II) Authorizing and Approving the Conduct of Store Closing Sales, with Such Sales to be Free and Clear of all Liens, Claims, and Encumbrances, (III) Modifying Customer Programs at the Closing Stores, and (IV) Granting Related Relief [[Docket No. 16](#); filed August 6, 2025]

Response/Objection Deadline: September 2, 2025 at 4:00 p.m. (ET)

Responses/Objections Received:

- A. Objection of Certain Utility Companies to the Motion of Debtors for Entry and Final Orders (I) Approving the Debtors' Proposed Adequate Assurance of Payment for Future Utility Services, (II) Approving the Debtors' Proposed Procedures for Resolving Additional Assurance Requests, (III) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Services, (IV) Authorizing Payments to the Debtors' Utilities Administrator, and (V) Granting Related Relief [[Docket No. 231](#); filed August 25, 2025]

B. Informal comments from the Committee

Related Documents:

- i. Interim Order (I) Authorizing the Debtors to Assume the Agency Agreement, (II) Authorizing and Approving the Conduct of Store Closing Sales, With Such Sales to be Free and Clear of all Liens, Claims, and Encumbrances, (III) Modifying Customer Programs at the Closing Stores, and (IV) Granting Related Relief [[Docket No. 98](#); entered August 8, 2025]
- ii. Notice of Entry of Interim Order (I) Authorizing the Debtors to Assume the Agency Agreement, (II) Authorizing and Approving the Conduct of Store Closing Sales, With Such Sales to be Free and Clear of all Liens, Claims, and Encumbrances, (III) Modifying Customer Programs at the Closing Stores, and (IV) Granting Related Relief [[Docket No. 103](#); filed August 8, 2025]
- iii. Notice of Errata Regarding Exhibit A to Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to Assume the Agency Agreement, (II) Authorizing and Approving the Conduct of Store Closing Sales, With Such Sales to be Free and Clear of all Liens, Claims, and Encumbrances, (III) Modifying Customer Programs at the Closing Stores, and (IV) Granting Related Relief [[Docket No. 139](#); filed August 12, 2025]
- iv. Order (I) Modifying the Interim Store Closing Order and (II) Granting Related Relief [[Docket No. 228](#); entered August 25, 2025]
- v. Notice of Filing Revised Lists of Closing Stores and Non-Closing Stores [[Docket No. 240](#); filed August 25, 2025]
- vi. Declaration of Eric W. Kaup in Support of Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to Assume the Agency Agreement, (II) Authorizing and Approving the Conduct of Store Closing Sales, With Such Sales to be Free and Clear of all Liens, Claims, and Encumbrances, (III) Modifying Customer Programs at the Closing Stores, and (IV) Granting Related Relief [[Docket No. 243](#); filed August 26, 2025]
- vii. Declaration of David Braun in Support of Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to Assume the Agency Agreement, (II) Authorizing and Approving the Conduct of Store Closing Sales, With Such Sales to be Free and Clear of all Liens, Claims, and Encumbrances, (III) Modifying Customer Programs at the Closing Stores, and (IV) Granting Related Relief [[Docket No. 244](#); filed August 26, 2025]

- viii. Declaration of SB360 Capital Partners, LLC in Support of Debtors' Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to Assume the Agency Agreement, (II) Authorizing and Approving the Conduct of Store Closing Sales, With Such Sales to be Free and Clear of all Liens, Claims, and Encumbrances, (III) Modifying Customer Programs at the Closing Stores, and (IV) Granting Related Relief [[Docket No. 245](#); filed August 26, 2025]
- ix. **Certification of Counsel Regarding Final Order (I) Authorizing the Debtors to Assume the Agency Agreement, (II) Authorizing and Approving the Conduct of Store Closing Sales, With Such Sales to be Free and Clear of all Liens, Claims, and Encumbrances, (III) Modifying Customer Programs at the Closing Stores, and (IV) Granting Related Relief [[Docket No. 351](#); filed September 7, 2025]**

Status: **On September 7, 2025, the Debtors filed a revised form of order under certification of counsel in connection with this matter.** Accordingly, a hearing with respect to this matter is only required to the extent that the Court has any questions or concerns.

- 11. Motion of Debtors for Entry of an Order (I) Authorizing the Debtors to Retain and Compensate Professionals Utilized in the Ordinary Course of Business, (II) Establishing Procedures for Designating Such Professionals, and (III) Granting Related Relief [[Docket No. 182](#); filed August 19, 2025]

Response/Objection Deadline: September 2, 2025 at 4:00 p.m. (ET)

Responses/Objections Received:

- A. Informal comments from the U.S. Trustee
- B. Informal comments from the Committee

Related Documents:

- i. **Certification of Counsel Regarding Order (I) Authorizing the Debtors to Retain and Compensate Professionals Utilized in the Ordinary Course of Business, (II) Establishing Procedures for Designating Such Professionals, and (III) Granting Related Relief [[Docket No. 342](#); filed September 6, 2025]**

Status: **On September 6, 2025, the Debtors filed a revised form of order under certification of counsel in connection with this matter.** Accordingly, a hearing with respect to this matter is only required to the extent that the Court has any questions or concerns.

12. Motion of Debtors Seeking Entry of an Order (I) Setting Bar Dates for Filing Proofs of Claim, Including Requests for Payment Under Section 503(b)(9), (II) Establishing Amended Schedules Bar Date and Rejection Damages Bar Date, (III) Approving the Form of and Manner for Filing Proofs of Claim, Including Section 503(b)(9) Requests, and (IV) Approving Form and Manner of Notice Thereof [[Docket No. 183](#); filed August 19, 2025]

Response/Objection Deadline: September 2, 2025 at 4:00 p.m. (ET)

Responses/Objections Received:

- A. Informal comments from the U.S. Trustee
- B. Informal comments from the Committee
- C. Informal comments from Barclay Damon LLP

Related Documents:

- i. **Certification of Counsel Regarding Order (I) Setting Bar Dates for Filing Proofs of Claim, Including Requests for Payment Under Section 503(b)(9), (II) Establishing Amended Schedules Bar Date and Rejection Damages Bar Date, (III) Approving the Form of and Manner for Filing Proofs of Claim, Including Section 503(b)(9) Requests, and (IV) Approving Form and Manner of Notice Thereof [[Docket No. 338](#); filed September 6, 2025]**

Status: **On September 6, 2025, the Debtors filed a revised form of order under certification of counsel in connection with this matter.** Accordingly, a hearing with respect to this matter is only required to the extent that the Court has any questions or concerns.

13. Motion of Debtors for Entry of an Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals and (II) Granting Related Relief [[Docket No. 184](#); filed August 19, 2025]

Response/Objection Deadline: September 2, 2025 at 4:00 p.m. (ET)

Responses/Objections Received: None

Related Documents:

- i. **Certification of No Objection Regarding Motion of Debtors for Entry of an Order (I) Establishing Procedures for Interim Compensation and**

**Reimbursement of Expenses for Professionals and (II) Granting Related Relief [[Docket No. 350](#); filed September 6, 2025]**

**Status:** On September 6, 2025, the Debtors filed a certification of no objection regarding this matter. Accordingly, a hearing with respect to this matter is only required to the extent that the Court has any questions or concerns.

**II. CONTESTED MATTERS GOING FORWARD:**

14. Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Pay Prepetition Wages, Salaries, Other Compensation, and Reimbursable Expenses and (B) Continue the Compensation and Benefits Programs, and (II) Granting Related Relief [[Docket No. 4](#); filed August 6, 2025]

**Response/Objection Deadline:** September 2, 2025 at 4:00 p.m. (ET)

**Responses/Objections Received:**

- A. Objection to Entry of Final Orders Granting Wage Motion and Critical Vendor Motion [[Docket No. 314](#); filed September 2, 2025]

**Related Documents:**

- i. Interim Order (I) Authorizing the Debtors to (A) Pay Prepetition Wages, Salaries, other Compensation, and Reimbursable Expenses and (B) Continue the Compensation and Benefits Programs, and (II) Granting Related Relief [[Docket No. 80](#); entered August 7, 2025]
- ii. Notice of Entry of Interim Order (I) Authorizing the Debtors to (A) Pay Prepetition Wages, Salaries, Other Compensation, and Reimbursable Expenses and (B) Continue the Compensation and Benefits Programs, and (II) Granting Related Relief [[Docket No. 114](#); filed August 8, 2025]
- iii. **Notice of Filing of Revised Proposed Final Order (I) Authorizing the Debtors to (A) Pay Prepetition Wages, Salaries, Other Compensation, and Reimbursable Expenses and (B) Continue the Compensation and Benefits Programs, and (II) Granting Related Relief [[Docket No. 348](#); filed September 6, 2025]**

**Status:** The Debtors anticipate filing a reply and a related motion for leave. The hearing on this matter will go forward.

15. Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to Pay Prepetition Claims of Certain (A) Critical Vendors, (B) Foreign Vendors, (C) 503(b)(9) Claimants, and (D) Lien Claimants, and (II) Granting Related Relief [[Docket No. 8](#); filed August 6, 2025]

**Response/Objection Deadline:** September 2, 2025 at 4:00 p.m. (ET)

Responses/Objections Received:

- A. Objection to Entry of Final Orders Granting Wage Motion and Critical Vendor Motion [[Docket No. 314](#); filed September 2, 2025]
- B. Informal comments from the Committee

Related Documents:

- i. Interim Order (I) Authorizing the Debtors to Pay Prepetition Claims of Certain (A) Critical Vendors, (B) Foreign Vendors, (C) 503(b)(9) Claimants, and (D) Lien Claimants, and (II) Granting Related Relief [[Docket No. 81](#); entered August 7, 2025]
- ii. Notice of Entry of Interim Order (I) Authorizing the Debtors to Pay Prepetition Claims of Certain (A) Critical Vendors, (B) Foreign Vendors, (C) 503(b)(9) Claimants, and (D) Lien Claimants, and (II) Granting Related Relief [[Docket No. 109](#); filed August 8, 2025]
- iii. **Notice of Filing of Revised Proposed Final Order (I) Authorizing the Debtors to Pay Prepetition Claims of Certain (A) Critical Vendors, (B) Foreign Vendors, (C) 503(b)(9) Claimants, and (D) Lien Claimants, and (II) Granting Related Relief [[Docket No. 347](#); filed September 6, 2025]**

Status: **The Debtors anticipate filing a reply and a related motion for leave.** The hearing on this matter will go forward.

- 16. Motion of Debtors for Entry of an Order (I) Conditionally Approving the Adequacy of the Disclosure Statement, (II) Approving (A) the Solicitation and Voting Procedures and (B) the Forms of Ballots and Notices in Connection Therewith, (III) Scheduling a Combined Hearing and Setting Related Dates and Deadlines, and (IV) Granting Related Relief [[Docket No. 187](#); filed August 19, 2025] (the “Solicitation Procedures Motion”)

Response/Objection Deadline: September 2, 2025 at 4:00 p.m. (ET)

Responses/Objections Received:

- A. Limited Objection and Reservation of Rights of 429 Fulton Street LLC, 3902 Annadale Lane, LP, Belden Mall LLC, Bridgewater Commons Mall II, LLC, Broadstone CLE Illinois, LLC, Broward Mall LLC, Capital Mall LP, Centennial Real Estate Company, LLC, CenterCal Properties, LLC, Champlain Centre North LLC, Continental Realty, FR Del Monte, LLC, FR Grossmont, LLC, FRIT Florida, LLC, Federal Realty OP LP, GTM Denton, Ltd., Gallatin Mall Group, L.L.C., KRE Colonie Owner, LLC, Northpark Mall Limited Partnership, PGIM Real Estate, Pacific QKC Management PR, LLC, Palm Desert Pacific Owner LLC, Pappas Laguna No. 2, L.P., Park Mall, L.L.C., Plaza West Covina LP, Poag Shopping Centers, LLC,

Southlake Indiana LLC, Star-West Franklin Park Mall, LLC, Starwest Great Northern Mall LLC, Star-West Parkway Mall LP, The Forbes Company, The Macerich Company, and YTC Mall Owner, LLC to the Motion of Debtors for Entry of an Order (I) Conditionally Approving the Adequacy of the Disclosure Statement, (II) Approving (A) the Solicitation and Voting Procedures and (B) the Forms of Ballots and Notices in Connection Therewith, (III) Scheduling a Combined Hearing and Setting Related Dates and Deadlines, and (IV) Granting Related Relief [[Docket No. 328](#); filed September 4, 2025]

- B. Informal comments from the U.S. Trustee
- C. Informal comments from the Certain Landlords

Related Documents:

- i. Joint Chapter 11 Plan of Claire's Holdings LLC and its Debtor Affiliates [[Docket No. 185](#); filed August 19, 2025] (the "Plan")
- ii. Disclosure Statement for the Joint Chapter 11 Plan of Claire's Holdings LLC and its Debtor Affiliates [[Docket No. 186](#); filed August 19, 2025] (the "Disclosure Statement")

Status: **The Debtors anticipate filing revised versions of the Plan, the Disclosure Statement and a revised order approving the Solicitation Procedures Motion prior to the hearing.** The hearing on this matter will go forward.

- 17. Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Postpetition Financing and (B) Utilize Cash Collateral, (II) Granting Liens and Superpriority Administrative Expense Claims, (III) Modifying the Automatic Stay, (IV) Scheduling a Final Hearing, and (V) Granting Related Relief [[Docket No. 188](#); filed August 20, 2025] (the "DIP Motion")

Response/Objection Deadline: September 2, 2025 at 4:00 p.m. (ET);  
extended for certain landlord parties

Responses/Objections Received:

- A. Informal comments from the Committee
- B. Informal comments from Barclay Damon LLP
- C. Informal comments from STB (ABL Lender)
- D. Informal comments from Certain Landlords
- E. Informal comments from Kelley Drye & Warren LLP



- F. **Objection of Certain Landlords to Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Postpetition Financing and (B) Utilize Cash Collateral, (II) Granting Liens and Superpriority Administrative Expense Claims, (III) Modifying the Automatic Stay, (IV) Scheduling a Final Hearing, and (V) Granting Related Relief** [[Docket No. 333](#); filed September 5, 2025]

Related Documents:

- i. Declaration of Amy Lee in Support of the Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Postpetition Financing and (B) Utilize Cash Collateral, (II) Granting Liens and Superpriority Administrative Expense Claims, (III) Modifying the Automatic Stay, (IV) Scheduling a Final Hearing, and (V) Granting Related Relief [[Docket No. 189](#); filed August 20, 2025]
- ii. Declaration of David R. Salemi in Support of (1) Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Postpetition Financing and (B) Utilize Cash Collateral, (II) Granting Liens and Superpriority Administrative Expense Claims, (III) Modifying the Automatic Stay, (IV) Scheduling a Final Hearing, and (V) Granting Related Relief and (2) Motion of Debtors for Entry of an Order (I) Authorizing and Approving the Sale of Going-Concern Assets Free and Clear of all Liens, Claims, Encumbrances and Other Interests and (II) Granting Related Relief [[Docket No. 191](#); filed August 20, 2025]
- iii. Notice of Filing of Revised Proposed Interim Order (I) Authorizing the Debtors to (A) Obtain Postpetition Financing and (B) Utilize Cash Collateral, (II) Granting Liens and Superpriority Administrative Expense Claims, (III) Modifying the Automatic Stay, (IV) Scheduling a Final Hearing, and (V) Granting Related Relief [[Docket No. 210](#); filed August 20, 2025]
- iv. Interim Order (I) Authorizing the Debtors to (A) Obtain Postpetition Financing and (B) Utilize Cash Collateral, (II) Granting Liens and Superpriority Administrative Expense Claims, (III) Modifying the Automatic Stay, (IV) Scheduling a Final Hearing, and (V) Granting Related Relief [[Docket No. 221](#); entered August 22, 2025]
- v. Notice of Entry of Interim Order (I) Authorizing the Debtors to (A) Obtain Postpetition Financing and (B) Utilize Cash Collateral, (II) Granting Liens and Superpriority Administrative Expense Claims, (III) Modifying the Automatic Stay, (IV) Scheduling a Final Hearing, and (V) Granting Related Relief [[Docket No. 234](#); filed August 25, 2025]

Status: **The Debtors anticipate filing a form of final order approving the DIP motion prior to the hearing.** The hearing on this matter will go forward.

18. Motion of Debtors for Entry of an Order (I) Authorizing and Approving the Sale of Going-Concern Assets Free and Clear of all Liens, Claims, Encumbrances and Other Interests and (II) Granting Related Relief [[Docket No. 190](#); filed August 20, 2025] (the “Sale Motion”)

Sale Objection Deadline: September 3, 2025 at 4:00 p.m. (ET)

Cure Objection Deadline: August 29, 2025 at 4:00 p.m. (ET)

Sale Responses/Objections Received:

- A. Limited Objection and Reservation of Rights of WPG Legacy, LLC to Notice of Potential Assumption or Assumption and Assignment of Certain Contracts or Leases and Proposed Sale [[Docket No. 256](#); filed August 28, 2025]
- B. Objection of 429 Fulton Street LLC, 3902 Annadale Lane, LP, Belden Mall LLC, Bridgewater Commons Mall II, LLC, Broadstone CLE Illinois, LLC, Broward Mall LLC, Capital Mall LP, Centennial Real Estate Company, LLC, CenterCal Properties, LLC, Champlain Centre North LLC, Continental Realty, FR Del Monte, LLC, FR Grossmont, LLC, FRIT Florida, LLC, Federal Realty OP LP, GTM Denton, Ltd., Gallatin Mall Group, L.L.C., KRE Colonie Owner, LLC, Northpark Mall Limited Partnership, PGIM Real Estate, Pacific QKC Management PR, LLC, Palm Desert Pacific Owner LLC, Pappas Laguna No. 2, L.P., Park Mall, L.L.C., Plaza West Covina LP, Poag Shopping Centers, LLC, Southlake Indiana LLC, Star-West Franklin Park Mall, LLC, Star-West Great Northern Mall LLC, Star-West Parkway Mall LP, The Forbes Company, The Macerich Company, and YTC Mall Owner, LLC to (I) Proposed Sale Transaction and Asset Purchase Agreement Between Debtors and Purchaser; and (II) Notice of Potential Assumption and Assignment of Certain Executory Contracts and Unexpired Leases [and Proposed Cure Costs] [[Docket No. 278](#); filed August 29, 2025]
- C. Objection of 5Rivers CRE LLC, Brixmor Property Group, Brookfield Properties Retail, Inc., Hines Global REIT, Jones Lang LaSalle, Kite Realty Group, Regency Centers, L.P., Site Centers Corp., and Turnberry Associates to (A) Notice of Potential Assumption or Assumption and Assignment of Certain Contracts or Leases, and (B) Motion of Debtors for Entry of an Order (I) Authorizing and Approving the Sale of Going-Concern Assets Free and Clear of all Liens, Claims, Encumbrances and Other Interests and (II) Granting Related Relief [[Docket No. 286](#); filed August 29, 2025]

- D. The Tanger Management Landlords' Limited Objection and Reservation of Rights to the Debtors' Sale Motion [[Docket No. 318](#); filed September 3, 2025]
- E. Brooks Shopping Centers, LLC, DLC Management Corporation, Inland Commercial Real Estate Services LLC, Pyramid Management Group, LLC, The Sterling Organization, Urban Edge Properties, and Westfield, LLC and Certain of their Landlord Affiliates' (A) Objection to Notice of Potential Assumption or Assumption and Assignment of Certain Contracts or Leases, and (B) Limited Objection to Motion of Debtors for Entry of an Order (I) Authorizing and Approving the Sale of Going-Concern Assets Free and Clear of all Liens, Claims, Encumbrances and Other Interests and (II) Granting Related Relief [[Docket No. 321](#); filed September 3, 2025]
- F. Joint Limited Objection of the Texas Taxing Authorities to the Motion of Debtors for Entry of an Order (I) Authorizing and Approving the Sale of Going-Concern Assets Free and Clear of all Liens, Claims, Encumbrances and Other Interests and (II) Granting Related Relief [[Docket No. 322](#); filed September 3, 2025]

Cure Responses/Objections Received:

- A. CBL & Associates Management, Inc.'s Limited Objection to Debtor's Notice of Potential Assumption or Assumption and Assignment of Certain Contracts or Leases [[Docket No. 233](#); filed August 25, 2025]
- B. Cure Objection of West Acres Development, LLP (Store No. 5146) [[Docket No. 236](#); filed August 25, 2025]
- C. Limited Cure Objection and Reservation of Rights ("Cure Objection") of Animas Valley Mall Realty Holding, LLC to the Debtors' Notice of Potential Assumption or Assumption and Assignment of Certain Contracts or Leases [[Docket No. 253](#); filed August 28, 2025]
- D. Limited Objection and Reservation of Rights of WPG Legacy, LLC to Notice of Potential Assumption or Assumption and Assignment of Certain Contracts or Leases and Proposed Sale [[Docket No. 256](#); filed August 28, 2025]
- E. Limited Objection and Reservation of Rights of Kahala Center Company to Notice of Potential Assumption or Assumption and Assignment of Certain Contracts or Leases [[Docket No. 259](#); filed August 28, 2025]
- F. The Tanger Management Landlords' Limited Objection and Reservation of Rights to Proposed Cure Amounts Set Forth in the Notice of Potential Assumption or Assumption and Assignment of Certain Contracts or Leases [[Docket No. 264](#); filed August 29, 2025]

- G. Objection of RCM St. George Properties LLC to Debtors' Notice of Potential Assumption or Assumption and Assignment of Certain Contracts or Leases [[Docket No. 265](#); filed August 29, 2025]
- H. Limited Objection of Landlords Plaza las Americas, Inc. and Plaza del Caribe, S.E. to Notice of Potential Assumption or Assumption and Assignment of Certain Contracts or Leases [[Docket No. 267](#); filed August 29, 2025]
- I. Objection and Reservation of Rights of Wiregrass SPE, LLC to the Debtors' Notice of Potential Assumption or Assumption and Assignment of Certain Contracts or Leases [[Docket No. 269](#); filed August 29, 2025]
- J. Objection of PREIT Services, LLC, as Agent for WG Park L.P, to Debtors' Notice of Potential Assumption and Assignment of Certain Contracts or Unexpired Leases [[Docket No. 270](#); filed August 29, 2025]
- K. Limited Objection and Reservation of Rights of Gemini ALTO Centerville Partners, LLC to Notice of Potential Assumption or Assumption and Assignment of Certain Contracts or Leases [[Docket No. 277](#); filed August 29, 2025]
- L. Objection of 429 Fulton Street LLC, 3902 Annadale Lane, LP, Belden Mall LLC, Bridgewater Commons Mall II, LLC, Broadstone CLE Illinois, LLC, Broward Mall LLC, Capital Mall LP, Centennial Real Estate Company, LLC, CenterCal Properties, LLC, Champlain Centre North LLC, Continental Realty, FR Del Monte, LLC, FR Grossmont, LLC, FRIT Florida, LLC, Federal Realty OP LP, GTM Denton, Ltd., Gallatin Mall Group, L.L.C., KRE Colonie Owner, LLC, Northpark Mall Limited Partnership, PGIM Real Estate, Pacific QKC Management PR, LLC, Palm Desert Pacific Owner LLC, Pappas Laguna No. 2, L.P., Park Mall, L.L.C., Plaza West Covina LP, Poag Shopping Centers, LLC, Southlake Indiana LLC, Star-West Franklin Park Mall, LLC, Star-West Great Northern Mall LLC, Star-West Parkway Mall LP, The Forbes Company, The Macerich Company, and YTC Mall Owner, LLC to (I) Proposed Sale Transaction and Asset Purchase Agreement Between Debtors and Purchaser; and (II) Notice of Potential Assumption and Assignment of Certain Executory Contracts and Unexpired Leases [and Proposed Cure Costs] [[Docket No. 278](#); filed August 29, 2025]
- M. Limited Objection of Capital Augusta properties LLC and W/S Peak Canton Properties LLC to Notice of Potential Assumption or Assumption and Assignment of Certain Contracts or Leases [[Docket No. 281](#); filed August 29, 2025]

- N. Objection of Greene Town Center LLC to Notice of Potential Assumption or Assumption and Assignment of Certain Contracts or Leases and Proposed Sale [[Docket No. 283](#); filed August 29, 2025]
- O. Objection of Easton Town Center II, LLC to Notice of Potential Assumption or Assumption and Assignment of Certain Contracts or Leases and Proposed Sale [[Docket No. 284](#); filed August 29, 2025]
- P. Objection of Azalea Shopping Center, LLC and PT-USRIF Meridian, LLC to Debtors' Notice of Potential Assumption or Assumption and Assignment of Certain Contracts or Leases [[Docket No. 285](#); filed August 29, 2025]
- Q. Objection of 5Rivers CRE LLC, Brixmor Property Group, Brookfield Properties Retail, Inc., Hines Global REIT, Jones Lang LaSalle, Kite Realty Group, Regency Centers, L.P., Site Centers Corp., and Turnberry Associates to (A) Notice of Potential Assumption or Assumption and Assignment of Certain Contracts or Leases, and (B) Motion of Debtors for Entry of an Order (I) Authorizing and Approving the Sale of Going-Concern Assets Free and Clear of all Liens, Claims, Encumbrances and Other Interests and (II) Granting Related Relief [[Docket No. 286](#); filed August 29, 2025]
- R. Objection of Benmoore Construction Group, Inc. to Debtors' Notice of Potential Assumption and Assignment of Certain Contracts or Unexpired Leases [[Docket No. 311](#); filed September 2, 2025]
- S. Limited Objection to Notice of Possible Assumption and Assignment and Cure Costs with Respect to Executory Contracts and Unexpired Leases filed by Simon Property Group, L.P. [[Docket No. 316](#); filed September 3, 2025]
- T. Cypress Flagstaff Mall LP's Objection to Debtors' Notice of Potential Assumption or Assumption and Assignment of Certain Contracts or Leases [[Docket No. 317](#); filed September 3, 2025]
- U. Cypress Equities Managed Services, LP's Objection to Debtors' Notice of Potential Assumption or Assumption and Assignment of Certain Contracts or Leases [[Docket No. 319](#); filed September 3, 2025]
- V. Limited Objection by Treasure Valley Marketplace to Debtors' Notice of Potential Assumption and Assignment of Executory Contracts or Unexpired Leases and Cure Amount [[Docket No. 320](#); filed September 3, 2025]
- W. Brooks Shopping Centers, LLC, DLC Management Corporation, Inland Commercial Real Estate Services LLC, Pyramid Management Group, LLC, The Sterling Organization, Urban Edge Properties, and Westfield, LLC and Certain of their Landlord Affiliates' (A) Objection to Notice of Potential Assumption or Assumption and Assignment of Certain Contracts or Leases, and (B) Limited Objection to Motion of Debtors for Entry of an Order (I)

Authorizing and Approving the Sale of Going-Concern Assets Free and Clear of all Liens, Claims, Encumbrances and Other Interests and (II) Granting Related Relief [[Docket No. 321](#); filed September 3, 2025]

Related Documents:

- i. Declaration of David R. Salemi in Support of (1) Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Postpetition Financing and (B) Utilize Cash Collateral, (II) Granting Liens and Superpriority Administrative Expense Claims, (III) Modifying the Automatic Stay, (IV) Scheduling a Final Hearing, and (V) Granting Related Relief and (2) Motion of Debtors for Entry of an Order (I) Authorizing and Approving the Sale of Going-Concern Assets Free and Clear of all Liens, Claims, Encumbrances and Other Interests and (II) Granting Related Relief [[Docket No. 191](#); filed August 20, 2025]
- ii. Declaration of Elise S. Frejka, CIPP/US, in Support of the Motion of Debtors for Entry of an Order (I) Authorizing and Approving the Sale of Going-Concern Assets Free and Clear of all Liens, Claims, Encumbrances and Other Interests and (II) Granting Related Relief [[Docket No. 192](#); filed August 20, 2025]
- iii. Notice of Potential Assumption or Assumption and Assignment of Certain Contracts or Leases [[Docket No. 209](#); filed August 20, 2025]
- iv. Notice of Entry of Interim Order (I) Authorizing the Debtors to (A) Obtain Postpetition Financing and (B) Utilize Cash Collateral, (II) Granting Liens and Superpriority Administrative Expense Claims, (III) Modifying the Automatic Stay, (IV) Scheduling a Final Hearing, and (V) Granting Related Relief [[Docket No. 234](#); filed August 25, 2025]
- v. **Notice of Withdrawal of ECF #322 Joint Limited Objection of the Texas Taxing Authorities to the Motion of Debtors for Entry of an Order (I) Authorizing and Approving the Sale of Going-Concern Assets Free and Clear of all Liens, Claims, Encumbrances and Other Interests and (II) Granting Related Relief [[Docket No. 335](#); filed September 5, 2025]**
- vi. **First Supplemental Notice of Potential Assumption or Assumption and Assignment of Certain Contracts or Leases [[Docket No. 336](#); filed September 5, 2025]**

Debtors' Witness Information:

- A. David R. Salemi, Managing Director in the Financial Restructuring Group at Houlihan Lokey Capital, Inc.
- B. Elise S. Frejka, CIPP/US, attorney from the Law Firm Frejka PLLC

Status: The hearing as it relates to the cure objections is adjourned to a date and time to be determined. **The Debtors anticipate filing a revised form of order approving the Sale Motion prior to the hearing.** The hearing on this matter will go forward.

Dated: September 7, 2025  
Wilmington, Delaware

*/s/ Colin A. Meehan*

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